

**IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA**

CASE NO. 2019-031155-CA-01

ECP HOLDINGS III, LLC ("ECP-III"); ECP
HOLDINGS V, LLC; SUREFUNDING V, LLC; MCS
AGENT, LLC; MARKETPLACE CAPITAL
STRATEGIES, LLC; and SUREFUNDING, LLC

Plaintiffs,

v.

TRADEPAY CAPITAL, LLC, a Florida Limited
Liability company; RITESH SHAW (Citizen and
Resident of India); PIYUSH PARASMAL RAMPURIA
(Citizen and Resident of New Jersey); PUSPESH
KUMAR BAID a/k/a PIYUSH KUMAR JAIN
a/k/a P.K. JAIN a/k/a PUSPESH JAIN (Citizen of
India and Resident of Florida); MRINAL OJHA
(Citizen and Resident of India); ATIT SUDHIR
GANDHI (Citizen and Resident of India);
PATRICK DE LISI (Citizen and Resident of Florida);
and JOHN DOES 1-50.

Defendants.

_____ /

**PLAINTIFF'S AMENDED NOTICE OF ORAL
AND VIDEOTAPED DEPOSITIONS
ON LIMITED JURISDICTIONAL ISSUES**

Plaintiffs, Surefunding, LLC, et al, submits the following Notice of Deposition pursuant to
Florida law, stating:

To: *ALL COUNSEL OF RECORD*

Please take notice that Plaintiffs will take the oral (and videotaped) deposition testimony of the following witnesses on the dates and times indicated below. The depositions will be taken pursuant to applicable Florida law and will be limited to narrow jurisdictional issues associated with or related to Piyush Rampuria and his role in Tradepay Capital, LLC (“Tradepay”), and management of Tradepay as represented in the Tradepay internal documents and filings with the Secretary of State, as compared to Mr. Rampuria’s testimony. The depositions will begin at the times indicated, and will continue from day-to-day until completed.

WITNESSES/DATE LOCATION AND TIME¹

1. Michael Ullman

DATE: March 17, 2020
TIME: 9:00 a.m. EST
LOCATION:

Ullman & Ullman, P.A.
7700 West Camino Real
Suite 401
Boca Raton, FL 33433

2. Robert Salinas

DATE: March 17, 2020
TIME: 1:00 p.m. EST
LOCATION:

Reality Check Business Solutions, LLC
1001 N. Federal Hwy
Suite 202
Hallandale, FL 33009

3. Patrick De Lisi

DATE: March 18, 2020
TIME: 9:00 a.m. EST
LOCATION:

Offices of Alejandro F. Garcia, Esq.

¹ The Plaintiffs reserve the right to also seek a limited deposition of Tradepay’s corporate representative. At present, there is a dispute regarding the source of the authority for Tradepay to retain Mr. Brodsky. Once that issue is resolved, the necessity for a Tradepay deposition will be determined.

RAMHOFER GARCIA & MOORE, PLLC
11900 Biscayne Blvd.
Suite 742
North Miami, FL 33181

4. Pushpesh Kumar Baid a/k/a “P.K. Jain”

DATE: March 18, 2020
TIME: 11:00 a.m. EST
LOCATION:

COFFEY BURLINGTON, P.L.
2601 South Bayshore Drive, Penthouse One
Miami, Florida 33133

5. Atit Gandhi

DATE: March 18, 2020
TIME: 1:00 p.m. EST
LOCATION:

BRODSKY FOTIU-WOJTOWICZ, PLLC
200 SE 1st Street, Suite 400
Miami, Florida 33131

6. Mrinal Ojha

DATE: March 18, 2020
TIME: 3:00 p.m. EST
LOCATION:

BRODSKY FOTIU-WOJTOWICZ, PLLC
200 SE 1st Street, Suite 400
Miami, Florida 33131

COURT REPORTER

The depositions will be recorded by a certified court reporter from the firm of Attkisson Baker and videotaped by Attkisson Baker.

SUBPOENA DUCES TECUM/DEMAND FOR PRODUCTION

Each witness is commanded to appear at the deposition with the following items:

1. A copy of each passport owned or possessed by each witness.
2. A copy of the driver's license of each witness.
3. If the person is not a citizen of the U.S., a copy of proof of legal status in the U.S. between 2016 and the present during any period of the person's presence in the U.S.
4. A copy of any records (paper or electronic) in the possession or control of each witness that pertains to the ownership, control, operation, and business of *Tradepay Capital, LLC* between 2016 and the present.
5. A copy of any records (paper or electronic) in the possession or control of each witness that refers to *Piyush Rampuria*.

Dated 28 February, 2020.

RESPECTFULLY SUBMITTED,

/s/ Joseph R. Johnson
TURNER & ASSOCIATES, P.A.
Tab Turner
4705 Somers Avenue
North Little Rock, AR 72116
501-791-2277 – Phone
tab@tturner.com

and
Joseph R. Johnson, Esquire
Florida Bar No: 372250
BABBITT & JOHNSON, P.A.
1641 Worthington Road, Suite 100
West Palm Beach, FL 33409
Tel: (561) 684-2500 / Fax: (561) 684-6308
Email: jjohnson@babbitt-johnson.com
kaguilera@babbitt-johnson.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on **January 28, 2020** a true and correct copy of the foregoing was electronically filed with the Clerk of Court using the Florida E-Filing Portal and was served on all counsel of record via transmission of the Notice of Electronic Filing generated by eservice@myflcourtaccess.com.

/s/ Joseph R. Johnson